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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

J. Ernest Kinard, Jr., Judge

Appellate Case No. 2014-002733

RECEIVED
JUL 13 2015
SC Court of Appeals

Samuel Washington, Jr., Respondent,

v.

South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a
Emerson Network Power, and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company is the Appellant.

**APPELLANT'S MOTION FOR EXTENSION TO FILE
INITIAL REPLY BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

NOW COMES counsel for Appellant, and moves this Honorable Court to grant an extension of time of ten (10) days beyond the ten (10) days as made applicable by Rule 208 and 209 of the South Carolina Appellate Court Rules to file its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal with the Clerk of Appellate Court. Counsel submits as justification for this request that this is Appellant's first request for an extension to file its Initial Reply Brief.

July 9, 2015



John A. Massalon, Esquire SC Bar #010279
I. Ryan Neville, Esquire SC Bar # 76513
WILLS MASSALON & ALLEN LLC
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ATTORNEYS FOR APPELLANT

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SC Court of Appeals

Samuel Washington, Jr.....Respondent,

v.

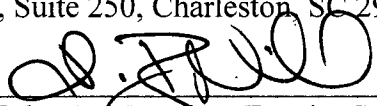
South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a
Emerson Network Power, and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company.....Appellant.

PROOF OF SERVICE

I certify that I served Appellant's Motion for Extension to File Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal on Respondent Samuel Washington, Jr. by depositing a copy of it in the United States Mail, postage prepaid, on July 9, 2015, addressed to his attorneys of record, Margie Bright Matthews, Margie Bright Matthews, LLC, Post Office Box 499, Walterboro, SC 29488 and S. Kirkpatrick Morgan, Jr. and Charles T. Slaughter, Walker Morgan, LLC, Post Office Box 949, Lexington, SC 29071, and that the same was also served on Co-Defendant Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power by depositing a copy of it in the United States Mail, postage prepaid, on July 9, 2015 addressed to his attorneys of record, H. Michael Bowers, Esquire, Smith Moore Leatherwood LLP, 25 Calhoun Street, Suite 250, Charleston, SC 29401.

July 9, 2015



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July 9, 2015

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JUL 13 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: Samuel Washington, Jr. v. South Carolina Electric and Gas Company, Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power
Appellate Case No.: 2014-002733
Our File No.: 1900-202

Dear Ms. Kitchings:

In regard to the above-referenced matter, please find enclosed for filing the original and seven (7) copies of Appellant's Motion for Extension to File Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal and Proof of Service. In addition, please find Wills Massalon & Allen LLC's check #6292 in the amount of \$25.00 representing the filing fee. Please return one (1) file-stamped copy to me in the self-addressed, stamped envelope provided. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

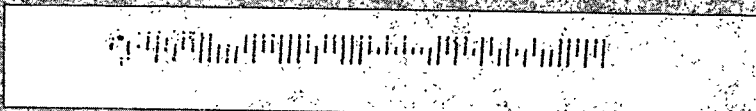
WILLS MASSALON & ALLEN LLC

Charline Bannister, Jr.

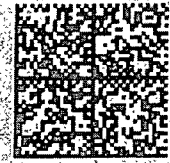
I. Ryan Neville
rneville@wmalawfirm.net

IRN/cb
Enclosures

cc: Margie Bright Matthews, Esquire
S. Kirkpatrick Morgan, Jr., Esquire
Charles T. Slaughter, Esquire
H. Michael Bowers, Esquire
Bryony Bowers Hodges, Esquire (via e-mail)
Ms. Sandy Kammer (via e-mail)



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